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6 Attorneys for Defendant
BLUE CROSS AND BLUE SHIELD OF NORTH
7 CAROLINA

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 SETON MEDICAL CENTER, a California
non-profit religious corporation,

11 Plaintiff,

12 vs.

13 BLUE CROSS AND BLUE SHIELD OF
NORTH CAROLINA, a North Carolina
14 non-profit corporation; and DOES 1
THROUGH 25, INCLUSIVE,

15 Defendants.
16

Case No. 15-cv-06254-JCS

**STIPULATION TO EXTEND
DEFENDANT BLUE CROSS AND BLUE
SHIELD OF NORTH CAROLINA'S
TIME TO ANSWER, MOVE OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

17 Pursuant to Civil Local Rule 6-1(a), Plaintiff, Seton Medical Center ("Plaintiff"),
18 and Defendant Blue Cross and Blue Shield of North Carolina ("BCBSNC"), by and through
19 their respective counsel of record, hereby stipulate as follows:

20 Plaintiff served its state court Complaint on November 25, 2015;

21 BCBSNC removed this civil action, Case No. CIV536368, from the Superior Court
22 of the State of California, for the County of San Mateo, to the United States District Court,
23 for the Northern District of California, based upon diversity on December 29, 2015;

24 A responsive pleading to the Complaint was due to be filed and served on behalf of
25 BCBSNC on or before January 5, 2016;

26 The parties stipulated to, and the Court granted, an extension of time of an additional
27 27 days to and including February 1, 2016 for BCBSNC to answer, move or otherwise
28 respond to the Complaint;

1 The parties are engaged in settlement negotiation and in order to facilitate further
 2 settlement discussions, BCBSNC has requested and Plaintiff has granted an additional 30
 3 days to and including March 1, 2016 for BCBSNC to answer, move or otherwise respond to
 4 the Complaint;

5 The next Court ordered deadline is on March 11, 2016 for the parties to meet and
 6 confer re initial disclosures and early settlement. An additional 30 days for BCBSNC to
 7 answer or respond to Plaintiff's Complaint will not alter the date of any event or any
 8 deadline already fixed by Court order;

9 Therefore, IT IS HEREBY STIPULATED by and between Plaintiff and BCBSNC,
 10 by and through their respective attorneys of record, that BCBSNC shall answer, move or
 11 otherwise respond to Plaintiff's Complaint on or before March 1, 2016.

12
 13 Dated: January 26, 2016

STEPHENSON, ACQUISTO & COLMAN
 Melanie Joy Stephenson
 Barry Sullivan
 Richard A. Lovich
 Karlene J. Rogers Aberman
 Christine V. Nitoff

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 15
 16
 17 By: /s/ Christine V. Nitoff
 18 Christine V. Nitoff
 19 Attorneys for Plaintiff
 20 SETON MEDICAL CENTER

21 Dated: January 26, 2016

VON BEHREN & HUNTER LLP
 William E. von Behren
 Joann Lee

22
 23
 24 By: /s/ Joann Lee
 25 Joann Lee
 26 Attorneys for Defendant
 27 BLUE CROSS AND BLUE SHIELD
 28 OF NORTH CAROLINA

27 Dated: January 27, 2016

